

Commonwealth of Kentucky
Division for Air Quality
RESPONSE TO COMMENTS

On the Draft Permit # F-05-042

Cowboy Charcoal USA

Albany, KY

August 21, 2006

ESMAIL HASSANPOUR, REVIEWER

SOURCE I.D. #: 021-053-00014

SOURCE A.I. #: 15850

ACTIVITY #: APE20040002

SOURCE DESCRIPTION:

Cowboy Charcoal USA applied to the Kentucky Division for Air Quality to renew their permits, be issued a source wide Conditional Major permit, and add a second fabric filter baghouse to the existing one. The second baghouse will be installed and operated in parallel with the existing baghouse that controls Emission Unit 03. However, based on the letter dated July 24, 2006 the source decided it to eliminate the external stack for second fabric filter baghouse. The fabric filter baghouse will be located inside the building containing the associated process equipment, and vented inside the building rather than to the outside air. Therefore, the Division has removed the requirement for a compliance stack test requirement.. The source has been operating under permits C-92-152, and S-99-068, which are now combined into one source wide permit. Process equipment and emission points have been organized and consolidated under concise emission units, and plant roadways have been added as an emission unit.

The charcoal manufacturing source consists of the following emission units (EU): raw material wood screening and handling operation (EU-07), 14 wood carbonization ovens for production of charcoal product (EU-01), the charcoal stockpile operation (EU-06), the charcoal sizing and bagging operation (EU-03) or alternatively the bulk charcoal loadout operation (EU-04), plant roadways traffic (EU-08), and a 5 mmBtu per hour auxiliary fuel burner (insignificant activity), infrequently used for the startup of a wood carbonization oven. The wood ovens are normally maintained in continuous operation.

PUBLIC AND U.S. EPA REVIEW:

On June 8, 2006 the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *Clinton County News*, Kentucky. The public comment period expired 30 days from the date of publication. Comments were received from Mr. Roger Reehl, Environmental Consultant for URS Corporation on May 30, 2006, June 15, 2006, July 20, 2006, July 25, 2006, and August 3, 2006. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Please see Attachment A for a detailed explanation of the changes made to the permit.

Response to Comments

Comments on Cowboy Charcoal USA-Federally enforceable/conditional Major (Renewal Permit) No. F-05-042 and Statement of Basis submitted by Mr. Roger Reehl, Environmental Consultant for URS Corporation was received on May 30, 2006, June 15, 2006, July 20, 2006, July 25, 2006, and August 3, 2006.

Draft Permit

Source Comment #1: Correct the numbering of equipment on page 4 under **DESCRIPTION** and delete the additional baghouse and testing requirements.

Division's response: Comment acknowledged, and the changes have been made.

Source Comment #2: Delete on page 20 reference to additional new baghouse.

Division's response: Comment acknowledged, and the changes have been made.

Source Comment #3: On page 2 at item (b) under "3. Testing Requirements" for Emission Unit 01, Mr. Sam Crace, General Manager of Cowboy Charcoal, respectfully requests that the phrase "on a representative oven" be added to clarify for future readers what may be acceptable for the testing, in this situation where there are 14 like ovens, each having long duration process cycles and triple stacks to complicate testing, with extensive modifications indicated for testing facilities.

Division's response: The testing language in permit has not change based on conversation with permittee on July 25, 2006. The representative testing will be addressed in the future when testing protocol is submitted to the Division.

Source Comment #4: It is necessary that specified records have to be submitted two times a year for this non-major source? Since not required by U.S. EPA for non-major sources, it seems that once per year is frequent enough, as other states we are aware of have determined. (We are aware that your "Cabinet Provisions and Procedures for Issuing FEPs for Non-Major Sources" mentions twice yearly reporting).

Division's response: Yes, semi-annual reporting of specified records is required by regulation. The above referenced document is incorporated by reference in 401 KAR 52:040, Section 26.

Additional comment from permittee in permit on July 15, 2006: Source requested a change from daily recordkeeping and monitoring to monthly.

Division's response: This request has been reflected in the final permit.

Statement of Basis

Source Comment #6: The permittee commented on editorial errors in the statement of basis on July

11, 2006, July 20, 2006, and August 3, 2006.

Division's response: Editorial changes have been made where appropriate.

CREDIBLE EVIDENCE:

This permit contains provisions, which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.